

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF RUSSELL H.
FALCONER IN SUPPORT OF
FACEBOOK, INC.'S STATEMENT IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

I, Russell H. Falconer, hereby declare as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bar of Texas. I submit this declaration in support of Facebook’s Statement In Support Of Plaintiffs’ Administrative Motion To Consider Whether Another Party’s Materials Should Be Sealed (Dkt. 921). I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. A true and correct **redacted** copy of **Exhibit 73** to the Declaration of Lesley E. Weaver And Derek W. Loeser In Support Of Plaintiffs’ Reply In Support Of Motion For Sanctions (“Weaver & Loeser Declaration”), as filed at Dkt. 921-7, is attached hereto.

3. A true and correct **redacted** copy of **Exhibit 74** to the Weaver & Loeser Declaration, as filed at Dkt. 921-8, is attached hereto.

4. A true and correct **redacted** copy of **Exhibit 86** to the Weaver & Loeser Declaration, as filed at Dkt. 921-9, is attached hereto.

5. A true and correct **redacted** copy of **Exhibit 87** to the Weaver & Loeser Declaration, as filed at Dkt. 921-10, is attached hereto.

6. A true and correct **redacted** copy of **Exhibit 88** to the Weaver & Loeser Declaration, as filed at 923-20, is attached hereto.

7. Facebook proposes redacting the names of Facebook data tables and certain data systems, as well as descriptions of these tables and systems that reveal the architecture of the tables and systems and where user data is stored. I understand that, if publicly disclosed, this information could harm Facebook, and potentially its users, by indicating specific locations

where certain user data is stored and providing a roadmap to bad actors seeking to access user data.

8. Facebook proposes redacting the amount of computer processing time it would take to search a certain Facebook data system for a user's data. I understand that, if publicly disclosed, Facebook's competitors could use this information to infer the storage architecture and methodology of Facebook's data system, as well as the volume of user data in Facebook's data system, and take advantage of this information in building rival systems and better understanding Facebook's technical capabilities, to Facebook's competitive disadvantage.

9. Facebook proposes redacting log-in credentials for a confidential document repository for this litigation. Ex. 87 at 4. I understand that, if publicly disclosed, this confidential information could grant unauthorized individuals access to documents Facebook has designated Confidential or Highly Confidential under the Protective Order in this action. Dkt. 122.

10. Facebook proposes redacting an internal guide for Facebook engineers to one of Facebook's data systems responsible for storing user data. Ex. 74 at internal Ex. A. This document contains technical details and capabilities of the data system, such as how user data is stored and organized in the system. I understand that, if publicly disclosed, this information could be used by Facebook's competitors to mimic Facebook's internal engineering practices or methods for storing and processing large quantities of data, to Facebook's competitive disadvantage, and by bad actors to learn about Facebook's data system and access user data.

11. Facebook proposes redacting a table of data pipelines that analyze ad impression and ad click data, as well as the names of the output tables in Facebook's data systems. Ex. 73 at 1–2, internal Ex. A. I understand that Facebook's internal naming structure for these data

pipelines and tables sheds light on the specific locations where data is stored at Facebook and that, if publicly disclosed, this information could harm Facebook, and potentially its users, by providing a roadmap to bad actors seeking to access Facebook's internal systems.

12. Facebook proposes redacting descriptions of how Facebook developed certain targeted advertising products. Ex. 73 at 2; Ex. 74 at 6–7. Facebook's ability to match advertisements to the users most interested in them is an essential aspect of its business. I understand that, if publicly disclosed, this content would disclose the data inputs, Facebook tools, and algorithms used to develop Facebook's targeted advertising products. I also understand that Facebook's competitors could take advantage of this information to improve their own targeted advertising products, to Facebook's competitive disadvantage.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 2, 2022 in Dallas, Texas.

/s/ Russell H. Falconer

Russell H. Falconer